1	MELANIE A. HILL, ESQ. Nevada State Bar No. 8796		
2	LAW OFFICE OF MELANIE HILL 9345 W. Sunset Road, Suite 100 Las Vegas, NV 89148 Tel: (702) 362-8500 Fax: (702) 362-8505 Melanie@MelanieHillLaw.com Attorney for Defendant Michael Sabicer		
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9	UNITED STATES DISTRICT COURT		
10	DISTRICT OF NEVADA		
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12	UNITED STATES OF AMERICA,	Case No: 2:12-cr-00082-MMD-VCF-12	
13	Plaintiff,		
14	v.	DEFENDANT MICHAEL SABICER'S UNOPPOSED MOTION TO	
15	MICHAEL SABICER,	CONDUCT A PRE-PLEA PRESENTENCE	
16	Defendant.	INVESTIGATION REPORT AND PROPOSED ORDER	
17			
18 19	COMES NOW appointed counsel Melanie A. Hill, Esq. counsel for defendant Michael		
20	Sabicer, and hereby moves this for an Order directing the Probation Department to prepare a		
21	Pre-Plea Presentence Investigation Report on Defendant Michael Sabicer for the following		
22	reasons:		
23			
24	1) It appears that Defendant Sabicer may be subject to substantially different		
25	sentencing ranges depending upon his verified criminal history as well as other		
26	factors surrounding his offense and plea. Defendant Sabicer's decision regarding		
27	how to proceed may be drastically impacted by his sentencing exposure in the		
28			

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regard. The pre-plea presentence report will promote judicial economy and aid in the manner in which this case is ultimately resolved.

- 2) Undersigned counsel therefore respectfully requests an order directing the Department of Probation to conduct a pre-plea presentence investigation report as soon as possible as there is a time sensitive plea offer on the table.
- 3) Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney Kimberly Frayn, regarding this request and she has no opposition.
 DATED this 18th day of July, 2012.

LAW OFFICE OF MELANIE HILL

/s/ Melanie A. Hill

Melanie A. Hill, Esq. 9345 W. Sunset Road, Suite 100 Las Vegas, NV 89148

Tel: (702) 362-8500 Fax: (702) 362-8505

Melanie@MelanieHillLaw.com

Counsel for Defendant Michael Sabicer

1 **CERTIFICATE OF SERVICE** 2 This certifies that the undersigned has served a copy of the foregoing on the following 3 counsel of record via the ECF system on July 19, 2012: 4 5 Brenda Weksler Nancy_Vasquez@fd.org, brenda_weksler@fd.org C. Stanley Hunterton shunterton@huntertonlaw.com 6 Craig W Drummond craig@drummondfirm.com, office@drummondfirm.com 7 albregts@hotmail.com, kjlapointe2@hotmail.com Daniel J. Albregts 8 James A Oronoz jim@oronozlawyers.com, alicia@oronozlawyers.com, luke@oronozlawyers.com 9 kimberly.frayn@usdoj.gov, norma.vizcarra2@usdoj.gov Kimberly M Frayn 10 Margaret M Stanish MStanish@wswlawlv.com, WSW@wswlawlv.com 11 Melanie A Hill Melanie@MelanieHillLaw.com, kristinsmith23@gmail.com 12 Michael P. Kimbrell mpkimbrell@aol.com 13 Michael J. Miceli thomaspitaro@yahoo.com 14 Michael W Sanft sanftlawgroup@mac.com, diana.valencia82@gmail.com 15 Philip Brown thelasvegasdefender@gmail.com 16 Terrence M Jackson <u>Terry.Jackson.Esq@gmail.com</u> 17 18 /s/ Melanie A. Hill An Employee of Law Office of Melanie Hill 19 20 21 22 23 24 25 26 27 28

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL SABICER,

Defendant.

Case No: 2:12-cr-00082-MMD-VCF-12

ORDER GRANTING DEFENDANT
MICHAEL SABICER'S UNOPPOSED
MOTION TO CONDUCT A PREPLEA PRESENTENCE
INVESTIGATION REPORT

ORDER

IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Sentence Investigation Report on Defendant Michael Sabicer and make it available to counsel on or before July 27, 2012.

DATED this 20th day of July, 2012.

UNITED STATES DISTRICT JUDGE